

In the United States District Court  
for the Northern District of Texas  
Lubbock Division

Ralph Jenkins Harding III and  
Ginger Newton Harding,

*Plaintiffs,*

v.

Civil Action No. 5:17-cv-188

Higginbotham Insurance Agency, Inc.,  
PURE Risk Management, LLC and  
Privilege Underwriters Reciprocal  
Exchange (PURE),

*Defendants.*

Jury Demanded

---

**JOINT MOTION FOR DISMISSAL WITH PREJUDICE**

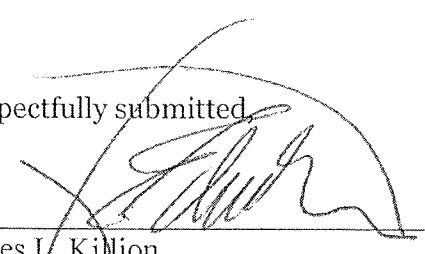
---

**TO THE HONORABLE UNITED STATES DISTRICT JUDGE:**

COME NOW Plaintiffs Ralph Jenkins Harding III and Ginger Newton Harding, and Defendants, Privilege Underwriters Reciprocal Exchange (PURE), PURE Risk Management, LLC, and Higginbotham Insurance Agency, Inc., and file this Joint Motion for Dismissal with Prejudice and respectfully show this Honorable Court the following:

The parties have reached a settlement of all of Plaintiffs' claims in this lawsuit. Consequently, the parties jointly move to dismiss the lawsuit in its entirety and respectfully request the Court enter an order of dismissal with prejudice of all claims asserted by Plaintiffs in this action, with each party to bear its own costs.

Respectfully submitted,



---

James L. Killion  
State Bar No: 11409100  
[jim@killionlaw.com](mailto:jim@killionlaw.com)  
Samantha Peabody Estrello  
State Bar No: 24056112  
[samantha@killionlaw.com](mailto:samantha@killionlaw.com)  
J. Edwin Price  
State Bar No: 16300300  
[Eprice1@nts-online.net](mailto:Eprice1@nts-online.net)

KILLION LAW FIRM, PC  
2521 74<sup>th</sup> Street (79423)  
P.O. Box 64670  
Lubbock, Texas 79464  
Telephone: (806) 748-5500  
Facsimile: (806) 748-5505

J. EDWIN PRICE, P.C.  
2301 Broadway  
Lubbock, Texas 79401  
Telephone: (806) 747-5000  
Facsimile: (806) 553-6959

**ATTORNEYS FOR PLAINTIFFS**

/s/ Michael D. Williams  
Michael D. Williams  
Texas Bar No. 21564330  
Federal ID. No. 6982  
Ewell H. "Jack" Jackson IV  
State Bar No. 00792598  
Federal ID No. 18775  
Brown Sims, P.C.  
1177 W. Loop South, 10<sup>th</sup> Floor  
Houston, Texas 77027  
Phone: (713) 629-1580  
Fax: (713) 629-5027  
Email: mwilliams@brownsims.com  
Email: jjackson@brownsims.com

**ATTORNEYS FOR DEFENDANTS**

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing pleading has been served upon all counsel of record on this 7<sup>th</sup> day of August, 2018.

/s/ Michael D. Williams  
Michael D. Williams